



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street, 3rd floor
New York, New York 10007

July 21, 2021

BY ECF

The Honorable Robert W. Lehrburger
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Takayo Matsui, as mother and natural guardian of K.M., a minor v.
United States of America, No. 20 Civ. 7800 (RWL)*

Dear Judge Lehrburger:

I write respectfully on behalf of the parties to jointly request a 60-day extension of the fact discovery deadline—from July 23, 2021 to September 21, 2021—in the above-referenced medical malpractice claim brought pursuant to the Federal Tort Claims Act. See ECF No. 16. This is the third request for an extension of the fact discovery deadline. The parties seek additional time (i) to depose the federally funded clinic physician, (ii) to obtain records from K.M.’s new pediatrician, (iii) to obtain responses to a second set of discovery demands; and (iv) to depose K.M.’s plastic surgeon.

If the Court grants this request, the parties respectfully requests a corresponding sixty-day extension of the remaining deadlines in this case: the October 22, 2021 deadline for the completion of expert discovery would extend to December 21, 2021.

We thank the Court for its consideration of this submission.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

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cc: Counsel of record (by ECF)